

The Law Offices of
Scott A. Korenbaum
11 Park Place, Suite 914
New York, New York 10007
Tel: (212) 587-0018 Fax: (212) 658-9480

March 22, 2016

BY ECF

Hon. Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. N208
Brooklyn, NY 11201

Re: Howrilka v. City of New York, et al.
15 CV1113 (KAM) (RER)

Dear Magistrate Judge Reyes:

I represent Ms. Lydia Howrilka. I write to request a second – and final – three month extension of the discovery deadline. I make this request in order to permit the parties to complete discovery. While I originally thought that discovery could be completed by March 25th, I have encountered a series of personal issues that prevented me from accomplishing this goal -- I do not express them here for reasons that I am confident the Court appreciates. However, if the Court wishes to hear from me, I am willing to discuss them in private. Fortunately, I have resolved my issues.

Tobias Zimmerman, Esq., counsel for the City defendants, and Timothy Parlatore, Esq., counsel for defendant Urena, do not object to this request. As noted, this represents the parties' second request for the extension of the discovery deadline. If granted, the deadline to complete discovery will be June 24, 2016. Additionally, if this request is granted, then the parties request that the April 12, 2016, conference be rescheduled.

Thank you for your consideration of these matters.

Respectfully submitted,

/s

Scott A. Korenbaum

SAK:sak

cc: Defense Counsel (by ECF)